

## Wenatchee

## Sportsmen's Association

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Wenatchee Sportsmen's Association (WSA)

Comments on Stray Gulch Road SEPA 14059

Comments on SEPA Checklist prepared by Marty Peoples Department of Fish and Wildlife Biologist

This SEPA document was prepared 8/12/14 and signed and submitted on 8/20/14. The deadline for public comment is 9/12/11, which makes the comment window 21 days long. This is a very short time in which to respond and therefore some input is provided in the form of questions (we would like answered) rather than objective input.

- 1. Par. B. 1 indicates "steep slopes". Par. B. 8, h. indicates "YES, SLOPES OVER 30%". Par. B. 1. b however, indicates the steepest slope is "30%". This indicates a steeper operating area than indicated in the construction zone. If this is the case than back hauling rather than side casting material may be required to prevent sediment delivery to the adjacent stream.
- 2. Par. B.3.c.2 Indicates that "SOME ROAD RUNOFF COULD ENTER THE FORD LOCATIONS ONLY IF THERE IS TRAFFIC DURING PERIODS WHERE THERE IS WATER IN THE DRAW PRIOR TO VEGETATION ESTABLISHMENT." Given that there may be no vegetation established in places on this road surface and the steepness, on parts of the newly constructed, we are concerned that sedimentation and road surface degradation may occur if these roads are used during wet conditions. Our recommendation is that seasonal use be included as part of the administration consideration in developing this road since Wenatchee Sportsmen's Association understands the continual lack of road maintenance funding.
- 3. Par. B. 5.a. Lists birds and animals that have been spotted in proximity of the road construction site. Deer, Elk, and Big horn sheep, are listed as well as many bird Species. WSA is opposed to the construction of this road because it provides access to elk winter range on the West Bar. If this road is built we believe that it needs to be controlled with seasonal closure as with the southerly part of the Colockum winter range to protect wildlife during its most vulnerable time. We continue to support the DFW Mission: "Serve Washington's citizens by protecting, restoring and enhancing fish and wildlife and their habitats, while providing sustainable and wildlife-related recreation and commercial opportunities." This Mission is not addressed under Par.B.12. b. & c. b. indicates "NO, THIS PROJECT WILL INCREASE RECREATIOAL OPPORTUNITIES BY ALLOWING DRIVING UP STRAY GULCH THAT WAS LOST AS A RESULT OF ROAD ABANDONMENT." c. indicates "NONE" as proposed measures to reduce impacts on recreation but has no mention of impact on wildlife as a result of this road development and use. Par.B.14.h. indicates, "THERE WILL BE NO TRANSPORTATION IMPACTS." We believe that this project, as proposed and presented here, will have impacts on both water quality and wildlife. To not address these and mitigate them through seasonal use and/or other administrative restrictions is an oversight and an over simplification of the issues.
- 4. Lastly, Par.14.f. Indicates, "USING PREVIOUS ROAD USAGE ESTIMATES FROM OTHER HUNTERS AND RECREATIONALISTS, APPROXIMATELY 15-20 TRIPS PER YEAR WILL USE THIS ROAD." In these days of tight budget and prudent policy advocacy by many Washington citizens, who would consider and promote building a road and creating an additional unfunded maintenance challenge to support 15-20 trips per year useage at a projected construction cost of \$25,000? That's a projected minimum of \$1,200 per trip not including future maintenance. Is this area really the best

place to put a road for public recreation if the projected use is that low? Why doesn't DFW use the money to enhance the road system farther West where vehicular access is less controversial and without the impacts on wildlife, especially elk and deer winter range?